

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MELISSA ARZU, individually and as the
Administrator of the Estate of KEVIN ISMAEL
GREENIDGE, Deceased and MELISSA ARZU
individually,

Plaintiffs,

Case No. 1:23-cv-02116 (SDA)

-against-

AMERICAN AIRLINES, INC.,

Defendant.

DECLARATION OF JUDY BLANCHARD

I, Judy Blanchard, under penalty of perjury, declare and state:

1. “My name is Judy Blanchard I am over 18 years of age and I am giving this declaration freely and voluntarily. I have personal knowledge of all matters set forth herein unless otherwise stated and all statements set forth are true and correct.

2. I have been employed with American Airlines, Inc. (“**American Airlines**”) as a flight attendant since 1989. During my flight attendant training at American Airlines, I received extensive training on the inspection and use of Automatic Electronic Defibrillators (“**AEDs**”) installed on aircraft flown by American Airlines.

3. Prior to the departure of every flight, flight attendants are required by American Airlines Inflight Manual section 9.20.1 (attached hereto) to inspect the onboard AEDs to insure that the status light on the AED is blinking green and that the device has a green seal. According to our training and inflight materials, these checks indicate that the device is in good working order. Otherwise, we are to advise the flight captain that the aircraft cannot depart until a replacement AED is installed.

4. I was a flight attendant on American Airlines flight #614 with scheduled June 6, 2022 departure from Honduras to Miami (the “**Flight**”). Prior to the departure of the Flight, I checked the onboard AED pursuant to American Airlines’ policy and my training and confirmed that the AED’s green light was blinking and that it had a green seal. This told me that the device was in proper working order.

5. During the Flight, a passenger (Kevin Greenidge) became unresponsive in his seat. I was one of the first flight attendants to assess and attend to Mr. Greenidge. After he was removed from his seat, I set up the onboard AED (the same one I had inspected as part of my pre-flight checks) on Mr. Greenidge and it was immediately operational, providing verbal instructions to me and others assisting in life saving efforts for Mr. Greenidge. The AED then administered several electronic shocks to Mr. Greenidge's body. The electronic shocks caused Mr. Greenidge's body to move upward. The AED appeared to function as we were trained it should. The AED continued to provide instructions to me and the others assisting me until we landed and it was removed by local EMS personnel.

6. I have no knowledge that the AED on the Flight was ever in New York.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing statement is true and correct and within my personal knowledge."

Executed: August 10, 2023.

A handwritten signature in cursive script, reading "Judy Blanchard", written over a horizontal line.

Judy Blanchard

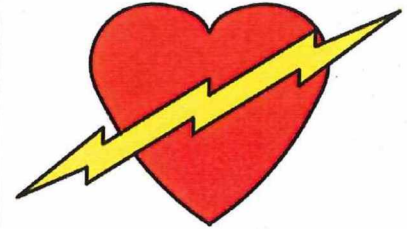
9.20 Medical Equipment

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9.20.1 Automated External Defibrillator (AED)

08DEC21



Description

- Used in conjunction with CPR on person (eight years of age or older) experiencing cardiac arrest
- Only American Airlines AED units (**Figure 1**) can be used on board
 - medical personnel are prohibited from using their own AED units

Figure 1



- Can be used on a person with a pacemaker and/or internal defibrillator

- pacemaker/internal defibrillator appears as a hard lump beneath the skin and can have an overlying scar
- place pads at least one inch away from the internal device before defibrillation
- Coordinate with the captain prior to final approach when the AED is being used



Preflight

- 1) Check status of AED: verify green status indicator light is blinking
 - Notify the captain or agent immediately if the AED is not present, has no seal, or is locked with a yellow or red seal
- 2) Verify presence of seal
 - Green, unit OK for use
 - Yellow, one set of Pad-Paks missing - unit is still usable
 - Red, no usable Pad-Pak (not usable)

NOTE

If no seal present, verify unit contents and lock with appropriate colored seal



If Status Indicator is Flashing Red or No Flashing Present

- 1) Break seal and perform the appropriate selftest
- 2) Remove AED unit from soft case and ensure the Pad-Pak is installed correctly by resetting the Pad-Pak
 - To reset the Pad-Pak, squeeze tabs on upper sides of Pad-Pak and slide outward
 - Press/push Pad-Pak firmly into AED unit until you hear a click indicating the Pad-Pak is fully engaged
 - Wait ten seconds for a flashing green light. If flashing red light remains or if flashing green light remains off, change the Pad-Pak
- 3) If AED passes self-test, unit is to be locked with yellow seal and returned to storage location
 - If green light appears on indicator light, AED is okay to use

If AED fails self-test, unit needs to be replaced

 - Complete Event Information Label
 - Lock AED with red seal and return unit to storage location
- 4) Notify the flight deck (or agent, if flight deck is not present) if the unit needs to be replaced



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